

**Goddard Law PLLC**  
39 Broadway  
Suite 1540  
New York 10006

# INVOICE

**Nunez, Qiana**

**Invoice 10002**

PRE-BILL

<b>Date</b>	Jun 17, 2021
<b>Terms</b>	N/A
<b>Service Thru</b>	Jun 17, 2021

**In Reference To: Nunez v. Community Health Center of Richmond (Labor)**

<b>Date</b>	<b>By</b>	<b>Services</b>	<b>Hours</b>	<b>Rates</b>	<b>Amount</b>
06/05/2020	SD	<b>Review:</b> Reviewed file to draft complaint	0.20	\$ 375.00/hr	\$ 75.00
06/05/2020	SD	<b>Correspondence:</b> Emailed QN re: response.	0.10	\$ 375.00/hr	\$ 37.50
06/05/2020	MG	<b>Meeting:</b> Call to discuss claims and strategy	0.60	\$ 500.00/hr	\$ 300.00
06/05/2020	SD	<b>Phone Call:</b> Call with MG about complaint draft and claims.	0.60	\$ 375.00/hr	\$ 225.00
06/05/2020	SD	<b>Phone Call:</b> Call with Qiana Nunez to discuss next steps in case.	0.50	\$ 375.00/hr	\$ 187.50
06/09/2020	SD	<b>Correspondence:</b> Emailed Matt re: reviewing complaint.	0.10	\$ 375.00/hr	\$ 37.50
06/09/2020	SD	<b>Review:</b> Reviewed edits to complaint and sent to complaint to client.	0.20	\$ 375.00/hr	\$ 75.00
06/09/2020	SD	<b>Correspondence:</b> Emailed client re: edits to complaint.	0.40	\$ 375.00/hr	\$ 150.00
06/10/2020	SD	<b>Correspondence:</b> Emailed client re: complaint.	0.10	\$ 375.00/hr	\$ 37.50
06/10/2020	SD	<b>Draft:</b> Drafted and sent consent form.	0.20	\$ 375.00/hr	\$ 75.00
06/10/2020	MG	<b>Draft:</b> Drafted and worked on Complaint - <del>see to work</del> [REDACTED]	2.70	\$ 500.00/hr	\$ 1,350.00
06/10/2020	SD	<b>Correspondence:</b> Emailed Qiana Nunez re: consent form.	0.30	\$ 375.00/hr	\$ 112.50
06/15/2020	SD	<b>Draft:</b> Edited complaint.	0.40	\$ 375.00/hr	\$ 150.00
06/15/2020	SD	<b>Correspondence:</b> Exchanged emails with Qiana Nunez re: [REDACTED]	0.20	\$ 375.00/hr	\$ 75.00
06/16/2020	MG	<b>Draft:</b> Edited complaint.	1.70	\$ 500.00/hr	\$ 850.00
06/17/2020	SD	<b>Other:</b> Filed complaint in SDNY.	0.90	\$ 375.00/hr	\$ 337.50

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06/18/2020	SD	<b>Draft:</b> Drafted waiver of service and sent complaint and waiver to OC.	0.40	\$ 375.00/hr	\$ 150.00
06/18/2020	SD	<b>Correspondence:</b> Emailed HR re: service of complaint.	0.10	\$ 375.00/hr	\$ 37.50
06/22/2020	SD	<b>Correspondence:</b> Followed up on waiver of service.	0.10	\$ 375.00/hr	\$ 37.50
06/23/2020	SD	<b>Correspondence:</b> Emailed MG re: transfer to EDNY.	0.20	\$ 375.00/hr	\$ 75.00
06/23/2020	SD	<b>Phone Call:</b> Discuss waiver of service with HR.	0.10	\$ 375.00/hr	\$ 37.50
06/23/2020	SD	<b>Correspondence:</b> Emailed HR waiver of service.	0.10	\$ 375.00/hr	\$ 37.50
06/26/2020	SD	<b>Draft:</b> Client meeting and research on [REDACTED]	1.50	\$ 375.00/hr	\$ 562.50
07/01/2020	SD	<b>Correspondence:</b> Emailed MG.	0.10	\$ 375.00/hr	\$ 37.50
07/06/2020	SD	<b>Correspondence:</b> Emailed OC re: call tomorrow to transfer case.	0.10	\$ 375.00/hr	\$ 37.50
07/07/2020	SD	<b>Court Time:</b> Court conference.	0.20	\$ 375.00/hr	\$ 75.00
07/07/2020	SD	<b>Draft:</b> Drafted and sent stip for transfer to OC.	0.40	\$ 375.00/hr	\$ 150.00
07/07/2020	SD	<b>Other:</b> Filed Stip and proposed order.	0.10	\$ 375.00/hr	\$ 37.50
07/09/2020	SD	<b>Phone Call:</b> Call with MG re: [REDACTED]	0.10	\$ 375.00/hr	\$ 37.50
07/09/2020	SD	<b>Phone Call:</b> Call with MW re: [REDACTED]	0.40	\$ 375.00/hr	\$ 150.00
07/10/2020	SD	<b>Phone Call:</b> Call with MG.	0.10	\$ 375.00/hr	\$ 37.50
07/29/2020	SD	<b>Research:</b> Researched [REDACTED]	0.70	\$ 375.00/hr	\$ 262.50
07/29/2020	SD	<b>Phone Call:</b> Call with MG re: [REDACTED]	0.30	\$ 375.00/hr	\$ 112.50
07/29/2020	SD	<b>Correspondence:</b> Emailed [REDACTED] re: [REDACTED]	0.20	\$ 375.00/hr	\$ 75.00
07/29/2020	SD	<b>Correspondence:</b> Emailed [REDACTED]	0.20	\$ 375.00/hr	\$ 75.00
07/29/2020	SD	<b>Correspondence:</b> Emailed MC and RD re: fact pattern.	0.30	\$ 375.00/hr	\$ 112.50

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<b>Service Thru</b>	Jun 17, 2021

07/30/2020	SD	<b>Phone Call:</b> Call with [REDACTED] of action.	0.30	\$ 375.00/hr	\$ 112.50
07/30/2020	SD	<b>Research:</b> Researched additional regulations.	0.70	\$ 375.00/hr	\$ 262.50
07/30/2020	SD	<b>Correspondence:</b> Emailed David Rosen.	0.10	\$ 375.00/hr	\$ 37.50
08/06/2020	SD	<b>Correspondence:</b> Reviewed letter on Motion to Dismiss.	0.10	\$ 375.00/hr	\$ 37.50
08/07/2020	SD	<b>Phone Call:</b> Call with [REDACTED]	0.10	\$ 375.00/hr	\$ 37.50
08/10/2020	SD	<b>Phone Call:</b> Call with Qiana Nunez.	0.30	\$ 375.00/hr	\$ 112.50
08/13/2020	MG	<b>Draft:</b> Worked on editing complaint.	1.60	\$ 500.00/hr	\$ 800.00
08/19/2020	SD	<b>Draft:</b> Drafted and filed amended complaint.	0.60	\$ 375.00/hr	\$ 225.00
09/01/2020	SD	<b>Correspondence:</b> Emailed HR re: new response dates.	0.10	\$ 375.00/hr	\$ 37.50
09/03/2020	SD	<b>Phone Call:</b> Call with [REDACTED]	0.20	\$ 375.00/hr	\$ 75.00
09/03/2020	SD	<b>Correspondence:</b> Emailed client re: status	0.10	\$ 375.00/hr	\$ 37.50
09/03/2020	SD	<b>Phone Call:</b> Call with Qiana Nunez.	0.30	\$ 375.00/hr	\$ 112.50
09/11/2020	SD	<b>Phone Call:</b> Call with client	0.70	\$ 375.00/hr	\$ 262.50
09/11/2020	SD	<b>Phone Call:</b> Call with Qiana Nunez.	0.40	\$ 375.00/hr	\$ 150.00
09/14/2020	SD	<b>Correspondence:</b> Updated clilo.	0.20	\$ 375.00/hr	\$ 75.00
10/14/2020	SD	<b>Phone Call:</b> Call with [REDACTED]	0.10	\$ 375.00/hr	\$ 37.50
10/14/2020	SD	<b>Correspondence:</b> Emailed [REDACTED] damages [REDACTED]	0.30	\$ 375.00/hr	\$ 112.50
10/14/2020	SD	<b>Correspondence:</b> Texted with Qiana Nunez.	0.10	\$ 375.00/hr	\$ 37.50
10/15/2020	SD	<b>Correspondence:</b> Texted with Qiana Nunez re: therapy	0.20	\$ 375.00/hr	\$ 75.00
11/10/2020	SD	<b>Phone Call:</b> Call with MG re: next steps.	0.40	\$ 375.00/hr	\$ 150.00
11/10/2020	SD	<b>Review:</b> [REDACTED]	0.10	\$ 375.00/hr	\$ 37.50

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11/17/2020	SD	<b>Correspondence:</b> Emailed demand to OC.	0.20	\$ 375.00/hr	\$ 75.00
11/20/2020	SD	<b>Correspondence:</b> Emailed OC re: dismissing claims.	0.10	\$ 375.00/hr	\$ 37.50
11/23/2020	SD	<b>Phone Call:</b> Call with Qiana Nunez re: update.	0.40	\$ 375.00/hr	\$ 150.00
11/23/2020	SD	<b>Correspondence:</b> Emailed [REDACTED] client.	0.10	\$ 375.00/hr	\$ 37.50
11/23/2020	SD	<b>Correspondence:</b> Emailed call-in number for tomorrow.	0.10	\$ 375.00/hr	\$ 37.50
11/23/2020	SD	<b>Correspondence:</b> Emailed OC re: stip.	0.10	\$ 375.00/hr	\$ 37.50
11/24/2020	SD	<b>Phone Call:</b> Call with [REDACTED]	2.70	\$ 375.00/hr	\$ 1,012.50
11/24/2020	SD	Drafted stipulation and sent to OC.	0.30	\$ 375.00/hr	\$ 112.50
12/01/2020	SD	<b>Correspondence:</b> Emailed OC re: stip.	0.10	\$ 375.00/hr	\$ 37.50
12/23/2020	SD	<b>Review:</b> Reviewed SS.	0.10	\$ 375.00/hr	\$ 37.50
12/23/2020	SD	<b>Phone Call:</b> Call with OC.	0.30	\$ 375.00/hr	\$ 112.50
12/23/2020	SD	<b>Phone Call:</b> Call with Qiana Nunez re: update to case.	0.40	\$ 375.00/hr	\$ 150.00
12/28/2020	SD	<b>Correspondence:</b> Emailed OC re: reduced demand.	0.40	\$ 375.00/hr	\$ 150.00
01/26/2021	HR	<b>Review:</b> Review Initial PreTrial Discovery and Mediation Schedule, calendar deadlines per Schedule and email SD regarding schedule/deadlines/contact with OC	0.30	\$ 150.00/hr	\$ 45.00
01/26/2021	SD	<b>Phone Call:</b> Call with HR re: next steps.	0.10	\$ 375.00/hr	\$ 37.50
01/27/2021	SD	<b>Correspondence:</b> Emailed OC re: discovery plan.	0.20	\$ 375.00/hr	\$ 75.00
01/29/2021	SD	<b>Phone Call:</b> Call with Qiana Nunez.	0.30	\$ 375.00/hr	\$ 112.50
02/03/2021	SD	<b>Correspondence:</b> Texted with Qiana Nunez.	0.30	\$ 375.00/hr	\$ 112.50
02/05/2021	MG	<b>Draft:</b> complied documents for exchange.	2.60	\$ 500.00/hr	\$ 1,300.00
02/10/2021	MG	<b>Draft:</b> Worked on submission.	1.00	\$ 500.00/hr	\$ 500.00

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02/12/2021	MG	<b>Other:</b> Worked on damage calculations.	1.80	\$ 500.00/hr	\$ 900.00
02/18/2021	SD	<b>Correspondence:</b> Emailed to [REDACTED] [REDACTED]	0.20	\$ 375.00/hr	\$ 75.00
02/19/2021	SD	<b>Review:</b> Prepped for negotiation call.	0.80	\$ 375.00/hr	\$ 300.00
02/19/2021	SD	<b>Phone Call:</b> Negotiation call with OC.	0.50	\$ 375.00/hr	\$ 187.50
02/19/2021	SD	<b>Correspondence:</b> Texted with Qiana Nunez [REDACTED] [REDACTED]	0.30	\$ 375.00/hr	\$ 112.50
02/22/2021	SD	<b>Correspondence:</b> Reduced demand.	0.10	\$ 375.00/hr	\$ 37.50
02/25/2021	SD	<b>Correspondence:</b> Emailed OC to follow up on demand.	0.10	\$ 375.00/hr	\$ 37.50
02/25/2021	SD	<b>Phone Call:</b> Call with Qiana Nunez.	0.20	\$ 375.00/hr	\$ 75.00
02/25/2021	SD	<b>Correspondence:</b> Emailed MG, HR and TC re: case.	0.10	\$ 375.00/hr	\$ 37.50
02/25/2021	SD	<b>Correspondence:</b> Emailed re: strategy in case.	0.20	\$ 375.00/hr	\$ 75.00
02/25/2021	AC	Discuss case strategy with SD and MG; emails with client re same; review court orders re mediation and discovery.	0.40	\$ 375.00/hr	\$ 150.00
03/04/2021	AC	Emails with opposing counsel re joint status report due tomorrow; review of file re same; file notice of appearance.	0.50	\$ 375.00/hr	\$ 187.50
03/05/2021	AC	Draft and file joint status report re settlement, and discussions with opposing counsel re same.	0.30	\$ 375.00/hr	\$ 112.50
03/09/2021	AC	Call with opposing counsel re agreement to ask Stephen Sonnenberg to mediate through the EDNY mediation program, and next steps.	0.20	\$ 375.00/hr	\$ 75.00
03/10/2021	AC	Emails with opposing counsel and potential mediator Stephen Sonnenberg about scheduling mediation.	0.30	\$ 375.00/hr	\$ 112.50

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03/11/2021	AC	Emails with client re mediation; arrangements with mediator; coordinate with CO re ECF filing of mediator selection.	0.30	\$ 375.00/hr	\$ 112.50
03/11/2021	CO	<b>Draft:</b> Draft Mediation document for filing.	0.50	\$ 150.00/hr	\$ 75.00
03/12/2021	HR	<b>Review:</b> Edits to Notice of Mediator Selection Email to CO Re-Edits to Notice of Mediator Selection	0.20	\$ 150.00/hr	\$ 30.00
03/12/2021	CO	<b>Other:</b> E-filed Notice of Selection of Mediator.	0.30	\$ 150.00/hr	\$ 45.00
03/17/2021	AC	Scheduling first conference call with mediator.	0.20	\$ 375.00/hr	\$ 75.00
03/18/2021	CO	<b>Filing:</b> Finalize and efile Notice of Withdrawal of Attorney (S. Duaban).	0.30	\$ 150.00/hr	\$ 45.00
03/19/2021	CO	<b>Filing:</b> Finalize and efile Notice of Withdrawal of Attorney (S. Duaban).	0.30	\$ 150.00/hr	\$ 45.00
04/26/2021	CO	<b>Correspondence:</b> Emails with Ms. Magnuson re: calendaring Mediation deadlines.	0.20	\$ 150.00/hr	\$ 30.00
04/26/2021	CO	<b>Correspondence:</b> Email to Mr. Consiglio re: Mediation documents.	0.10	\$ 150.00/hr	\$ 15.00
04/26/2021	CO	<b>Correspondence:</b> Review and respond to an email from Mr. Consiglio re: mediation documents.	0.10	\$ 150.00/hr	\$ 15.00
04/28/2021	CO	<b>Correspondence:</b> Email to client re: Mediation documents.	0.20	\$ 150.00/hr	\$ 30.00
04/28/2021	CO	<b>Correspondence:</b> Review Ms. Magnuson's email to client re: Mediation documents.	0.10	\$ 150.00/hr	\$ 15.00
04/28/2021	CO	<b>Correspondence:</b> Email to client re: Mediation preparation session.	0.10	\$ 150.00/hr	\$ 15.00
04/29/2021	CO	<b>Correspondence:</b> Emails to Ms. Magnuson re: [REDACTED] [REDACTED]	0.10	\$ 150.00/hr	\$ 15.00
05/01/2021	KM	<b>Review:</b> Review file and discovery documents in preparation for mediation and client meeting pre mediation	3.40	\$ 375.00/hr	\$ 1,275.00

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05/01/2021	KM	<b>Draft:</b> Mediation statement and review file and documents for same	4.60	\$ 375.00/hr	\$ 1,725.00
05/03/2021	CO	<b>Correspondence:</b> Email to Ms. Magnuson re: Mediation documents for signature.	0.10	\$ 150.00/hr	\$ 15.00
05/03/2021	KM	<b>Meeting:</b> Client meeting to prepare for mediation and discuss documents and discovery	2.80	\$ 375.00/hr	\$ 1,050.00
05/04/2021	CO	<b>Correspondence:</b> Review of Ms. Magnuson's email with the client re: scheduling and update the calendar.	0.10	\$ 150.00/hr	\$ 15.00
05/05/2021	CO	<b>Correspondence:</b> Review of email from Ms. Magnuson to JAMS re: executed Mediation Agreement.	0.10	\$ 150.00/hr	\$ 15.00
05/05/2021	CO	<b>Correspondence:</b> Review and respond to an email from client.	0.10	\$ 150.00/hr	\$ 15.00
05/05/2021	CO	<b>Correspondence:</b> Email to client re: revised Mediation Confidentiality Agreement.	0.10	\$ 150.00/hr	\$ 15.00
05/05/2021	CO	<b>Review:</b> Review and upload revised Mediation Confidentiality Agreement.	0.10	\$ 150.00/hr	\$ 15.00
05/05/2021	CO	<b>Review:</b> Review an email from Ms. Magnuson re: expenses, review of the file and respond.	0.30	\$ 150.00/hr	\$ 45.00
05/06/2021	KM	<b>Meeting:</b> Mediation Day and client meeting pre mediation	6.50	\$ 375.00/hr	\$ 2,437.50
05/10/2021	CO	<b>Correspondence:</b> Emails with Ms. Magnuson re: JAMS invoice.	0.20	\$ 150.00/hr	\$ 30.00
05/10/2021	CO	<b>Correspondence:</b> Email to Lindsay Rovira (JAMS) re: request for a comprehensive invoice.	0.10	\$ 150.00/hr	\$ 15.00
05/11/2021	CO	<b>Correspondence:</b> Review and respond to an email from Lindsay Rovira [JAMS] re: invoice.	0.10	\$ 150.00/hr	\$ 15.00
05/11/2021	CO	<b>Correspondence:</b> Forward update JAMS invoice to Ms. Magnuson for review.	0.10	\$ 150.00/hr	\$ 15.00

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05/11/2021	CO	<b>Correspondence:</b> Review and respond to an email from Ms. Magnuson re: invoice.	0.10	\$ 150.00/hr	\$ 15.00
05/12/2021	CO	<b>Correspondence:</b> Emails with Lindsay Rovira (JAMS) re: invoice.	0.30	\$ 150.00/hr	\$ 45.00
05/17/2021	CO	<b>Correspondence:</b> Emails with Ms. Magnuson re: Court notices and need for Notice of Appearance.	0.20	\$ 150.00/hr	\$ 30.00
05/17/2021	CO	<b>Filing:</b> Finalize and e-file Notice of Appearance.	0.40	\$ 150.00/hr	\$ 60.00
05/19/2021	HR	<b>Review:</b> Review SD Emails [REDACTED] and Stipulation Emails and call to Kelly Re-[REDACTED] and Stipulation	0.70	\$ 150.00/hr	\$ 105.00
06/07/2021	CO	<b>Correspondence:</b> Review and reply to email from Ms. Magnuson re: Notice of Appearance.	0.10	\$ 150.00/hr	\$ 15.00
06/08/2021	KM	<b>Review:</b> Review and revise settlement agreement including multiple back and forth emails with defense counsel and client regarding same from 5/15-6/8	1.30	\$ 375.00/hr	\$ 487.50
06/14/2021	HR	<b>Filing:</b> Finalized and Filed Letter Re-Extension of Time to File Motion for Settlement Approval	0.20	\$ 150.00/hr	\$ 30.00
06/17/2021	HR	<b>Research:</b> [REDACTED]	0.70	\$ 150.00/hr	\$ 105.00
06/17/2021	HR	<b>Review:</b> [REDACTED]	0.40	\$ 150.00/hr	\$ 60.00
06/17/2021	HR	<b>Research:</b> Look Up [REDACTED] [REDACTED] Emails to KM Re-Research Findings	0.20	\$ 150.00/hr	\$ 30.00

Total Hours	64.30 hrs
Total Labor	\$ 23,925.00
Total Invoice Amount	\$ 23,925.00
Previous Balance	\$ 0.00

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**Balance (Amount Due)      \$ 23,925.00**